

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

REYNALDO VALDEZ GARZA, JR.,

Defendant.

Case No.: 2:24-CR-0122-TOR-1

PROTECTIVE ORDER

The United States of America, having applied to this Court for a Protective Order, ECF No. 15, regulating disclosure of the discovery materials and the sensitive information contained therein to defense counsel in connection with the Government's discovery obligations, and the Court finding good cause therefore, **IT IS HEREBY ORDERED:**

1. The United States' Unopposed Motion for Protective Order Regulating Disclosure of Discovery and Sensitive Information, ECF No. 15, is **GRANTED**.

2. The United States is authorized to disclose the discovery including sensitive information and materials (hereinafter "Discovery") in its possession pursuant to the discovery obligations imposed by this Court.

3. Government personnel and counsel for Reynaldo Garza ("Defendant"), shall not provide, or make available, the sensitive information in the Discovery to

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1 any person except as specified in the Order or by approval from this Court. Counsel
2 for Defendant and the Government shall restrict access to the Discovery, and shall
3 only disclose the sensitive information in the Discovery to their client, office staff,
4 investigators, independent paralegals, necessary third-party vendors, consultants,
5 and/or anticipated fact or expert witnesses to the extent that defense counsel believes
6 is necessary to assist in the defense of their client in this matter or that the
7 Government believes is necessary in the investigation and prosecution of this matter.

8 4. Third parties contracted by the United States or counsel for Defendant
9 to provide expert analysis or testimony may possess and inspect the sensitive
10 information in the Discovery, but only as necessary to perform their case-related
11 duties or responsibilities in this matter. At all times, third parties shall be subject to
12 the terms of the Order.

13 5. Discovery in this matter will be available to defense counsel via access
14 to a case file on USA File Exchange. If necessary to review discovery with their
15 respective clients, defense counsel may download the discovery and duplicate only
16 once. Discovery materials may not be left in the possession of Defendant. In order
17 to provide discovery to a necessary third-party vendor, consultant, and/or anticipated
18 fact or expert witness, counsel for Defendant may duplicate the discovery only once.
19 No other copies may be made, by defense counsel or the Defendant, without prior
20 approval from this Court.

21 6. All counsel of record in this matter, including counsel for the United
22 States, shall ensure that any party, including the Defendant, that obtains access to
23 the Discovery, is provided a copy of this Order. Any other party that obtains access
24 to, or possession of, the Discovery containing discovery information once the other
25 party no longer requires access to or possession of such Discovery shall promptly
26 destroy or return the Discovery once access to Discovery is no longer necessary. No
27 other party that obtains access to or possession of the Discovery containing sensitive
28 information shall retain such access to or possession of the Discovery containing

1 sensitive information unless authorized by this Order, nor further disseminate such
2 Discovery expect as authorized by this Order or the further Order of this court. For
3 purposes of this Order, “other party” is any person other than appointed counsel for
4 the United States or counsel for Defendant.

5 7. All counsel of record, including counsel for the United States, shall
6 keep a list of the identity of each person to whom the Discovery containing sensitive
7 information is disclosed and who was advised of the requirements of this Order.
8 Neither counsel for Defendant nor counsel for the United States shall be required to
9 disclose this list of persons unless ordered to do so by the Court.

10 8. Upon entry of a final order of the Court in this matter and conclusion
11 of any direct appeals, government personnel and counsel for Defendant shall retrieve
12 and destroy all copies of the Discovery containing sensitive information, except that
13 counsel and government personnel may maintain copies in their closed files
14 following their customary procedures.

15 9. Government personnel and counsel for Defendant shall promptly report
16 to the Court any known violations of this Order.

17 **IT IS SO ORDERED.** The District Court Clerk is hereby directed to enter
18 this Order and provide copies to counsel.

19
20 **DATED** this 18th day of September, 2024.



A handwritten signature in blue ink that reads "Thomas O. Rice".

THOMAS O. RICE
United States District Judge